

GIBSON DUNN

Gibson, Dunn & Crutcher LLP

200 Park Avenue
New York, NY 10166-0193
Tel 212.351.4000
gibsondunn.com

Anne M. Champion
Direct: +1 212.351.5361
Fax: +1 212.351.5281
AChampion@gibsondunn.com

November 22, 2024

The Honorable John G. Koeltl
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, NY 10007

Re: GateGuard, Inc. v. Amazon.com, Inc., No. 21 Civ. 9321 (JGK) (VF)

Dear Judge Koeltl:

Pursuant to Rule I.E. and Rule II.D. of the Court's Individual Practices, Amazon respectfully submits this letter-motion to request an increase of the word limit for Amazon's reply brief in support of its motion to dismiss two claims in GateGuard's SAC, to deny class certification, and to strike class allegations. ECF No. 239. Amazon's reply to GateGuard's opposition is due on November 27. ECF No. 251.

Pursuant to Rule II.D., reply briefs are limited to 2,800 words or fewer. However, due to the complexity of Amazon's motion, Amazon respectfully requests that the word limit for its reply brief be increased to 3,800 words. This increase will benefit the Court and GateGuard by allowing Amazon to explain its position with greater clarity. Moreover, it is in the interests of fairness because Amazon sought to conserve judicial resources by seeking leave to file a single motion, rather than separate motions, and because it appears that GateGuard's opposition brief contains more than 8,400 words, *see* ECF No. 255, which is above the 7,000-word limit for an opposition brief, Rule II.D.¹ This is Amazon's first request for a word limit increase in this matter. Amazon has conferred with GateGuard, who consents to the relief requested.

We thank the Court for its consideration.

Respectfully submitted,

/s/ Anne M. Champion
Anne M. Champion

CC: All counsel of record (via ECF)

¹ Amazon does not know the exact word count of GateGuard's opposition brief because GateGuard did not include the word count certification required by Rule II.D.